

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION
LANDLORD AND TENANT BRANCH

510 4th STREET, N.W., Building B, Room #110, Washington, D.C. 20001 Telephone (202) 879-4879 www.dccourts.gov

Case No. LTB _____

Darryl Pounds

Plaintiff(s)

1212 New York Ave., N.W., Ste. 850

Address (No post office boxes)

Washington, DC

City

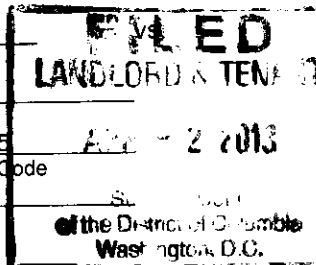
State

20005

Zip Code

(202) 466-8001

Phone Number



TBM Holdings, LLC and James Truit Redding t/a TruOrleans

Defendant(s)

400 H Street, N.E.

Address

Washington, DC

20002

Zip Code

Phone Number (if known)

SUMMONS TO APPEAR IN COURT AND NOTICE OF HEARING -- FORM 1S

YOU ARE HEREBY SUMMONED AND REQUIRED TO APPEAR ON May 8 2013 AT 9:00 A.M.
PROMPTLY, in the Landlord and Tenant Courtroom, Room 109, Bldg. B, 510 4th Street, NW.

Between E and F Streets, N.W., Judiciary Square Red Line Metro stop ♦ Wheelchair accessible entrance located on F Street side of building

1. You are being sued for possession of the premises you occupy.
2. This paper is a Summons in a lawsuit seeking your eviction.
3. The Complaint attached to this Summons states the grounds for possession claimed by the Plaintiff. If the Complaint is not attached, a copy is available in the Landlord and Tenant Clerk's Office at 510 4th Street, Building B, Room #110.
4. If you, or your attorney, do not appear on the date and time listed above, a default judgment may be entered against you giving Plaintiff the right to evict you from the premises without any further court hearings.
5. Court employees are not permitted to give advice on legal questions.

Notice to Occupant(s) Not Named on the Summons: If you live on the premises and wish to remain, you must come to Court even if you are not named as a Defendant on the Summons or Complaint.

PLEASE SEE THE BACK OF THIS FORM FOR IMPORTANT INFORMATION ABOUT THE COURT PROCESS. IF YOU HAVE ANY ADDITIONAL QUESTIONS ABOUT THE SUMMONS AND COMPLAINT, OR YOUR RIGHTS AND RESPONSIBILITIES, PLEASE CONSULT AN ATTORNEY PROMPTLY.

CITATORIO DE COMPARENCIA AL TRIBUNAL Y AVISO DE AUDIENCIA

POR MEDIO DE LA PRESENTE SE LE EXIGE Y ORDENA QUE COMPAREZCA EL May 8 2013 A LAS 9:00 A.M. PUNTUALMENTE a la Sala de Arrendadores e Inquilinos, 510 4th Street, NW. Edificio B.
Entre las Calles E y F, N.W., paradero de Metro, Judiciary Square, línea roja ♦ Entrada accesible para silla de ruedas por la Calle F.

1. Se le demanda por transferencia de la tenencia de la propiedad en que habita.
2. Este escrito es un citatorio de una demanda para su desalojamiento.
3. La demanda adjunta a este citatorio declara la base del demandante para la tenencia que pide. Si la demanda no está adjunta, hay una copia disponible en la oficina de la Secretaría de Arrendador e Inquilino en la 510 4th Street, NW, Edificio B #110.
4. Si usted o su abogado no comparecen a la hora y en la fecha indicadas, se podría emitir un fallo en su contra por incomparecencia, permitiendo así que el demandante lo desaloje del lugar sin necesitarse audiencias posteriores.
5. Al personal del tribunal no se les permite asesorar en cuestiones jurídicas.

Advertencia a los inquilinos no nombrados en la demanda: Si usted vive en la propiedad y desea permanecer ahí pero no ha sido mencionado como inquilino, debe presentarse al Tribunal aun si no es nombrado como demandado en la convocatoria o demanda.

VEA AL DORSO DE ESTE FORMULARIO: INFORMACIÓN IMPORTANTE SOBRE EL PROCESO JUDICIAL. SI TIENE MÁS PREGUNTAS SOBRE EL CITATORIO Y LA DEMANDA O SOBRE SUS DERECHOS Y DEBERES, CONSÚLTELE A UN ABOGADO PRONTO.

Mark R. Raddatz, Esq./E.L. Pugh, Esq. 468481/499250

Plaintiff/Plaintiff's Attorney

Unified Bar No.

1212 New York Ave. NW, Ste. 850 Washington, DC 20005

Address

Zip Code

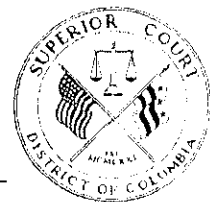
202 466-8001 mraddatz@creditors-law.com/epugh@creditors-law.com

Phone

Required only for attorneys)

CLERK OF THE COURT

Costs of this suit to date are \$ 31.37
Costas a la fecha



Case: 2013 LTB 008610



Dr

00046625077
Dr: LTB10

z appeler au (202) 879-4828 pour une traduction
(202) 879-4828

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**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION
LANDLORD AND TENANT BRANCH**
510 4th STREET, N.W., Building B, Room #110, Washington, D.C. 20001 Telephone (202) 879-4879

Case No. LTB _____

Darryl Pounds
Plaintiff(s)
1212 New York Ave., N.W., Ste. 850
Address (No post office boxes)
Washington, DC 20005
City State Zip Code
(202) 466-8001
Phone Number

vs.

TBM Holdings, LLC and James Truit Redding t/a TruOrleans
Defendant(s)
400 H Street, N.E.
Address
Washington, DC 20002
Zip Code
Phone Number (if known)

**VERIFIED COMPLAINT FOR POSSESSION OF REAL PROPERTY -- FORM 1D
(Commercial Property)**

DISTRICT OF COLUMBIA, ss:

1. I, Mark R. Raddatz, Esq./ E.L. Pugh II, Esq., 1212 New York Ave., N.W., Ste. 850 Washington, DC 20005 (202) 466-8001 swear or affirm, under penalties of perjury, that I have knowledge of the facts set forth in this Complaint and that I am: ☐ Plaintiff, **or** ☒ Plaintiff's attorney, **or** ☐ Plaintiff's agent authorized to make this verification and my relationship to Plaintiff is (explain, and if Plaintiff is a corporation, include your title) _____.
2. Plaintiff: ☒ is the Landlord or Owner, **or** ☐ has been appointed Personal Representative of the Estate in case no. _____ and is authorized to take possession of the property, **or** ☐ is not the Landlord, Owner, or Personal Representative, but has the right to demand possession because (explain) _____.
3. Plaintiff seeks possession of commercial property located at 400 H Street, N.E. Washington, D.C. Property is in possession of Defendant, who holds it without right. Plaintiff seeks possession of property because:
 - A. ☒ Defendant failed to pay: \$ 40,773.00 total amount due to the landlord from Sept. 2011 to March 2013.
Defendant owes:
 - ☒ Monthly base rent of \$ 12,392.00.
 - ☐ Common Area Maintenance (CAM) of \$ _____ (explain) _____.
 - ☐ Utility charges of \$ _____ (explain) _____.
 - ☒ Taxes of \$ 26,497 (explain) Part 2011, 2012 and 2013.
 - ☒ Late fees of \$ 3,793.00 per month for the months of Sept. 2012 to March 2013.
 - ☒ Reasonable attorneys' fees of \$ 750.00 to date, pursuant to paragraph 32 of the lease.
 - ☒ Other amount of \$ 4,000.00 for (explain) business loan.

Notice to quit has been: ☐ served as required by law, **or** ☒ I have personally reviewed the lease and Defendant has expressly waived the right to be served with a notice to quit in paragraph no. 21 on page number 12 of the lease, **or** ☐ Defendant has expressly waived that right in another document (attach copy).
 - B. ☐ Defendant failed to vacate the property after expiration of a properly served written ☐ Notice to Quit **or** ☐ Notice of Termination (Attach copy of Notice and affidavit of service of the Notice.)
 - 1) Content of the Notice:
 - ☐ All of the facts stated in the attached Notice were true at the time the Notice was served, **or**
 - ☐ Plaintiff relies only on the following facts in the attached Notice, which were true at the time the Notice was served: (specify) _____.
 - 2) Compliance with the Notice: (complete if applicable)
 - a. Defendant's conduct set forth in the Notice breaches the following paragraph number(s) or provision(s) of the written lease: _____.
 - b. Of the breaches listed in the attached Notice, Defendant failed to correct/cure the following breaches by the deadline set forth in the Notice: _____.

- C. ☐ For the following reason: ☐ Defendant is holding over after expiration of the lease.
☐ Defendant is not a tenant and has no legal right to occupy the premises.
☐ Other reason (explain fully) _____

Notice to quit: ☐ is not required, or ☐ has been served as required by law, or ☐ I have personally reviewed the lease and Defendant has expressly waived the right to be served with a notice to quit in paragraph no. _____ on page number _____ of the lease, or ☐ Defendant has expressly waived that right in another document (attach copy).

Therefore, Plaintiff asks the Court for: (check all that apply)

- ☒ Redeemable judgment for possession of the property described and costs taxed by the Clerk.
☐ Judgment for possession of the property described with no right to redeem the tenancy (non-redeemable judgment) and costs taxed by the Clerk.
☒ Money judgment for rent, fees defined as rent, and late fees in the total amount of \$40,773.00.
☒ A protective order requiring that all future rent be paid into the Court Registry until the case is decided.

Subscribed & sworn to before me this 2nd day of Apr, 2013

Mark R. Raddatz, Esq. E. L. Pugh II, Esq. 03/28/2013
 Plaintiff/Plaintiff's Attorney/Plaintiff's Agent Date

Notary Public _____

My Commission expires _____

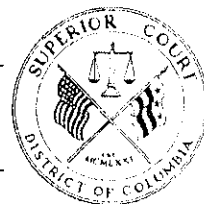
Title of Person Signing (if any) _____

Important Note to Parties: Court of Appeals Rule 49, Superior Court Rule of Civil Procedure 101, and Landlord and Tenant Rule 9 prohibit the unauthorized practice of law. Any person who is not a lawyer in good standing in the District of Columbia should be aware that he or she could be engaging in the unauthorized practice of law if he or she acts on behalf of another in the Landlord and Tenant Branch for any purpose other than to request a continuance.

Mark R. Raddatz, Esq. E. L. Pugh II, Esq. 468481/499250
 Plaintiff/Plaintiff's Attorney Unified Bar No.
 805 Fifteenth Street, NW Suite 201 Washington, DC 20005
 Address Zip Code
 202 466-8001 mraddatz@creditors-law.com
 Phone No. Email Address (required only for attorneys)

CLERK OF THE COURT

Costs of this suit to date are \$ 31.37



Para pedir una traducción, llame al (202) 879-4828

如需翻译, 请打电话 (202) 879-4828

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Để có một bản dịch, hãy gọi (202) 879-4828

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